

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE CALIFORNIA BAIL BOND
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:
ALL ACTIONS

Master Docket No. 19-cv-00717-JST-DMR

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER RE: EXTENSION TO FILE
THIRD CONSOLIDATED AMENDED
COMPLAINT**

1 Pursuant to Civil Local Rule 6-2, all Plaintiffs and Defendants (the “Parties”) in the
 2 above-entitled action stipulate as follows:

3 **WHEREAS**, the Court ordered the Parties to proceed with discovery on December 10,
 4 2020, with Dismissed Defendants¹ to submit pre-amendment discovery focused on deficiencies
 5 the Court identified in Plaintiffs’ Second Amended Complaint (ECF No. 151);

6 **WHEREAS**, the Court referred the management of discovery in this case, “including the
 7 issues set forth in the [P]arties’ joint case management statement, ECF No. 173,” to Magistrate
 8 Judge Ryu on January 25, 2021 (ECF No. 175);

9 **WHEREAS**, the deadline for Plaintiffs to file their Third Consolidated Amended
 10 Complaint (“TCAC”) is October 11, 2021 (ECF No. 199);

11 **WHEREAS**, on August 12, 2021, Plaintiffs and Dismissed Defendants submitted to
 12 Judge Ryu a dispute regarding the proper geographic scope of pre-amendment discovery based on
 13 certain search terms and custodians (ECF No. 208);

14 **WHEREAS**, on September 30, 2021, Judge Ryu set a deadline of November 29, 2021 for
 15 Dismissed Defendants to produce all responsive documents regardless of geography, except
 16 documents that pertain solely to individual bail bond transactions outside California (ECF No.
 17 230);

18 **WHEREAS**, the Parties have agreed to extend the deadline for Plaintiffs to file their
 19 TCAC by an additional 40 days beyond the November 29, 2021 deadline without prejudice to any
 20 Party seeking a further extension;

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 23 ¹ For the avoidance of doubt, the Dismissed Defendants are Allegheny Casualty Company,
 24 International Fidelity Insurance Company, AIA Holdings, Inc., American Contractors Indemnity
 25 Company, Bankers Insurance Company, Accredited Surety and Casualty Company, Inc.,
 26 Lexington National Insurance Company, Seneca Insurance Company, Continental Heritage
 27 Insurance Company, Seaview Insurance Company, Danielson National Insurance Company,
 28 Financial Casualty & Surety, Inc., Indiana Lumbermens Mutual Insurance Company, Lexon
 Insurance Company, North River Insurance Company, Philadelphia Reinsurance Corporation,
 Sun Surety Insurance Company, United States Fire Insurance Company, Universal Fire &
 Casualty Company, Williamsburg National Insurance Company, California Bail Agents
 Association, Golden State Bail Agents Association, American Bail Coalition, Inc., Two Jinn, Inc.,
 All-Pro Bail Bonds Inc., and Jerry Watson.

1 **WHEREAS**, the Court has set no further deadlines in this matter, and therefore none
2 would be affected;

3 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by and
4 between the Parties that Plaintiffs shall have until January 10, 2022 to file their TCAC without
5 prejudice to any Party seeking to further extend that deadline.

6 Dated: October 7, 2021

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1 **[PROPOSED] ORDER**
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7 **PURSUANT TO STIPULATION, IT IS SO ORDERED** that Plaintiffs shall have until January
8 10, 2022 to file their TCAC without prejudice to any Party seeking to further extend that
9 deadline.
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Dated: October 12, 2021



8 THE HONORABLE JON S. TIGAR
9 UNITED STATES DISTRICT JUDGE
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1 **ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

2 I, Adam Gitlin, attest that the concurrence in the filing of this document has been obtained
3 from the other signatories. Executed on October 7, 2021, in Oakland, California.

4 */s/ Adam Gitlin*

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